

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

COBBLESTONE WIRELESS, LLC,

*Plaintiff,*

v.

COMMSCOPE HOLDING COMPANY, INC.,  
COMMSCOPE INC., ARRIS US HOLDINGS,  
INC., ARRIS SOLUTIONS, INC., ARRIS  
TECHNOLOGY, INC., ARRIS ENTERPRISES  
LLC, ARRIS INTERNATIONAL LIMITED,  
ARRIS GLOBAL LTD.,

*Defendants.*

Case No. 2:23-00455-JRG-RSP

**JURY TRIAL DEMANDED**

**PLAINTIFF COBBLESTONE WIRELESS, LLC’S RESPONSE TO DEFENDANTS  
COMMSCOPE HOLDING COMPANY, INC. AND COMMSCOPE, INC.’S  
COUNTERCLAIMS**

Plaintiff and Counterclaim-Defendant Cobblestone Wireless, LLC (“Cobblestone,” “Plaintiff,” or “Counterclaim-Defendant”) hereby answers the Counterclaims of Defendants and Counterclaim-Plaintiffs CommScope Holding Company, Inc. and CommScope, Inc. (“CommScope,” “Defendants,” or “Counterclaim-Plaintiffs”), as follows:

**Nature of the Action**

1. Admit that Defendants’ counterclaims speak for themselves. Deny any other allegations in this paragraph.

**The Parties**

2. Admit.
3. Admit.

**Jurisdiction and Venue**

4. Admit that Defendants' counterclaims arise under the patent laws of the United States and that Defendants seek certain declaratory relief. Deny that Defendants are entitled to any such relief. Deny any other allegations in this paragraph.

5. Admit.

6. Admit.

**First Counterclaim**  
**Declaratory Judgment of Non-Infringement of the '802 Patent**

7. Plaintiff realleges Paragraphs 1-6 as though fully set forth herein.

8. Admit that Plaintiff's allegations in its Complaint speaks for themselves. Deny any other allegations in this paragraph.

9. Deny.

10. Admit that there is a case or controversy between the parties concerning alleged infringement of the '802 Patent. Deny any other allegations in this paragraph.

11. Admit that Defendants request a judicial determination and declaration that it does not infringe any valid claim of the '802 Patent. Deny that any such relief is appropriate. Deny any other allegations in this paragraph.

**Second Counterclaim**  
**Declaratory Judgment of Invalidity of the '802 Patent**

12. Plaintiff realleges Paragraphs 1-11 as though fully set forth herein.

13. Admit that Plaintiff's allegations in its Complaint speaks for themselves. Deny any other allegations in this paragraph.

14. Admit that there is a case or controversy between the parties concerning alleged validity of the '802 Patent. Deny any other allegations in this paragraph.

15. Admit that Defendants request a judicial determination and declaration that the claims of the '802 Patent are invalid. Deny that any such relief is appropriate. Deny any other allegations in this paragraph.

**PRAYER FOR RELIEF**

WHEREFORE, Cobblestone prays for the following relief with respect to Defendants' counterclaims:

- A. A judgment in favor of Plaintiff on all counterclaims asserted by Defendants;
- B. An adjudication that Defendants are not entitled to any relief on their counterclaims, including, without limitation, any fine or damages; and
- C. A dismissal with prejudice of Defendants' counterclaims;
- D. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys' fees against Defendants;
- E. Plaintiff's costs of suit against Defendants; and
- F. Any and all other relief as the Court may deem appropriate and just under the circumstances.

**DEMAND FOR JURY TRIAL**

Cobblestone demands a trial by jury on all issues so triable.

Dated: February 13, 2024

Respectfully submitted,

/s/ Reza Mirzaie

Reza Mirzaie

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**ATTORNEYS FOR PLAINTIFF,  
COBBLESTONE WIRELESS, LLC**

**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF System per Local Rule CV-5(a)(3) on February 13, 2024

/s/ Reza Mirzaie  
Reza Mirzaie